

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

RENEE GALLOWAY, *et al.*, on behalf of
themselves and all individuals similarly situated,

Plaintiffs,

v.

JUSTIN MARTORELLO, *et al.*,

Defendants.

Case No. 3:19-cv-00314-REP

**PLAINTIFFS' MOTION TO ENFORCE COMPLIANCE WITH § 3.5 OF THE
SETTLEMENT AGREEMENT**

Plaintiffs, by and through counsel, submit this Motion to Enforce Compliance with § 3.5 of the Settlement Agreement. For the reasons explained herewith, Plaintiffs request the Court to enforce this provision to require Mr. Tassone (or the current trustee) to appear before United States Magistrate Judge Mark Colombell on November 13, 2024, for the purpose of providing an update on each and every step taken he has taken in connection with the settlement, as well as the current status of the sale and all bids.

Respectfully submitted,
PLAINTIFFS

Date: October 25, 2024

/s/
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